## Safety Attribute Inspection (SAI) Data Collection Tool 4.4.4 Privileges and Limitations for Repairmen (AW)

### **ELEMENT SUMMARY INFORMATION**

### Purpose of this Element (certificate holder's responsibility):

 To ensure that certificated repairmen perform their assigned duties and responsibilities within the privileges and limitations of their certificate.

#### Objective (FAA oversight):

- To determine if the certificate holder's Privileges and Limitations for Repairmen process meets all applicable requirements of Title 14 of the Code of Federal Regulations (14 CFR) and FAA policies.
- To determine if the certificate holder's Privileges and Limitations for Repairmen process incorporates the safety attributes.
- To identify any shortfalls in the certificate holder's Privileges and Limitations for Repairmen process.

### **Specific Instructions:**

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#### SUPPLEMENTAL INFORMATION

### Specific Regulatory Requirements (SRRs):

SRRs:

119.43(b)

119.43(b)(1)

119.43(b)(2)

119.43(c)

121.135(a)(1)

121.135(b)(1)

121.135(b)(2)

121.135(b)(3)

121.371(a)

121.378(a)

121.383(a)(1)

121.383(a)(3)

121.709(b)(3)

65.103(a)

65.103(b)

D.084(e)

### Related CFRs & FAA Policy/Guidance:

Related CFRs:

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• FAA Policy/Guidance:

FAA Order 8300.10, volume 3, chapter 17

• FAA Policy/Guidance: HBAW 05-06

### **SAI SECTION 1 - PROCEDURES ATTRIBUTE**

**Objective:** Procedures, instructions, and information contained in the certificate holder's manual are documented methods for accomplishing a process. Policies contained in the certificate holder's manual should establish the certificate holder's compliance posture. Policies may not be stand-alone statements but may be imbedded within procedures, instructions, or information regarding a particular regulatory requirement. The questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder's manual has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated questions regarding who, what, when, where, and how. This section contains policy questions, procedural questions, and instructional or informational questions pertaining to various types of certificate holder requirements such as actions, prohibitions, or resources (i.e., personnel, facilities, equipment, technical data, etc.).

Tasi	Tasks		
	To meet this objective, the inspector must accomplish the following tasks:		
1.	Review the information listed in the Supplemental Information section of this DCT.		
2.	Review the duties and responsibilities for management and other personnel identified by the certificate holder who accomplish the Privileges and Limitations for Repairmen process.		
3.	Review the certificate holder's policies, procedures, instructions, and information necessary for the Privileges and Limitations of Repairmen process.		

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's manual content meet the specific regulatory and FAA policy requirements for a Privileges and Limitations for Repairmen process:	
1.1.	Does the certificate holder's manual permit a repairman to be directly in charge of only those maintenance, preventive maintenance, or alterations which are appropriate to the job for which he/she was employed and certificated?  SRRs: 121.378(a); 121.383(a)(3); 65.103(a)  Related Design JTIs:  1. Check that the certificate holder's manual has instructions and information addressing duties and responsibilities for each person who is directly in charge of maintenance and ensuring they hold an appropriate airman certificate.  Sources: 121.135(a)(1); 121.378(a)  Interfaces: 1.1.1(AW); 1.3.1(AW); 1.3.7(AW); 4.2.1(AW)  2. Check that the certificate holder manual system contains a policy to ensure that each repairman who is directly in charge of maintenance holds an appropriate airman certificate.  Sources: 121.135(b)(1); 121.378(a)  Interfaces: 1.1.1(AW); 1.3.1(AW); 1.3.7(AW); 4.2.1(AW)  3. Check that the certificate holder's manual has a general policy that the certificate holder may not use any person as an airman nor may any person serve as an airman unless that person is otherwise qualified for the operation for which he is to be used.  Sources: 121.135(b)(1); 121.383(a)(3)	☐ Yes☐ No, Explain
	Interfaces: 1.3.7(AW); 1.3.14(AW); 4.4.2(AW)	

1.2.	Does the certificate holder's manual require that an authorized repairman performing required inspections hold an airman certificate appropriate to the job for which he/she was employed and certificated?  SRRs: 121.371(a); 121.378(a); 65.103(a)  Related Design JTIs:  1. Check that the certificate holder's manual system has instructions and information on duties and responsibilities ensuring that each person performing required inspections holds an appropriate airman certificate.  Sources: 121.135(a)(1); 121.378(a)  Interfaces: 1.1.1(AW); 1.2.3(AW); 1.3.1(AW); 1.3.2(AW); 1.3.14(AW); 2.1.1(AW); 2.1.1(OP); 4.1.1(AW); 4.1.2(AW); 4.2.2(AW); 7.1.2(AW)	☐ Yes ☐ No, Explain
1.3.	Does the certificate holder's manual require that a repairman who performs duties under the repairman certificate understand the current instructions of the certificate holder and the manufacturer's continued airworthiness instructions relating to the specific operations concerned?  SRRs: 121.383(a)(3); 65.103(b)  Related Design JTIs:  1. Check that the certificate holder's manual has a general policy that the certificate holder may not use any person as an airman nor may any person serve as an airman unless that person is otherwise qualified for the operation for which he is to be used.  Sources: 121.135(b)(1); 121.383(a)(3)  Interfaces: 1.3.7(AW); 1.3.14(AW); 4.4.2(AW)	☐ Yes ☐ No, Explain
1.4.	Does the certificate holder's manual require that a repairman who supervises duties under the repairman certificate understand the current instructions of the certificate holder and the manufacturer's continued airworthiness instructions relating to the specific operations concerned?  SRRs: 121.383(a)(3); 65.103(b)  Related Design JTIs:  1. Check that the certificate holder manual system contains a policy to ensure that each repairman who is directly in charge of maintenance holds an appropriate airman certificate.  Sources: 121.135(b)(1); 121.378(a)  Interfaces: 1.1.1(AW); 1.3.1(AW); 1.3.7(AW); 4.2.1(AW)  2. Check that the certificate holder's manual has a general policy that the certificate holder may not use any person as an airman nor may any person serve as an airman unless that person is otherwise qualified for the operation for which he is to be used.  Sources: 121.135(b)(1); 121.383(a)(3)  Interfaces: 1.3.7(AW); 1.3.14(AW); 4.4.2(AW)	☐ Yes ☐ No, Explain
1.5.	Does the certificate holder's manual require an authorized repairman to prepare an airworthiness release or make an appropriate entry in the aircraft log only for that work for which he/she is employed and certificated?  SRRs: 121.709(b)(3)  Related Design JTIs:  1. Check that the certificate holder's manual system contains a policy that ensures an authorized repairman sign the airworthiness release or	☐ Yes ☐ No, Explain

	make an aircraft log entry.	
	Sources: 121.135(b)(1); 121.709(b)(3)	
	Interfaces: 1.1.1(AW); 1.2.1(AW); 1.2.3(AW); 1.3.1(AW); 1.3.5(AW); 1.3.7(AW); 1.3.14(AW); 3.2.3(OP); 4.2.1(AW); 5.1.8(AW); 5.1.8(OP); 5.1.9(AW); 5.1.9(OP)	
	<ol> <li>Check that the certificate holder's manual system has instructions and information for the authorized certificated repairman to sign the airworthiness release or make an aircraft log entry.</li> </ol>	
	Sources: 121.135(a)(1); 121.709(b)(3)	
	Interfaces: 1.1.1(AW); 1.2.1(AW); 1.2.4(AW); 1.3.1(AW); 1.3.5(AW); 1.3.7(AW); 1.3.14(AW); 3.2.3(OP); 4.2.1(AW); 5.1.8(AW); 5.1.8(OP); 5.1.9(AW); 5.1.9(OP)	
1.6.	If the certificate holder is authorized to conduct ferry flights using a special flight permit with continuous authorization, does the certificate holder's manual specify that a certificated repairman may certify only for the work for which he/she is employed?  SRRs: D.084(e)	☐ Yes ☐ No, Explain ☐ Not Applicable
	Related Design JTIs:	
	<ol> <li>Check that the certificate holder's manual has a general policy that the certificate holder may not use any person as an airman nor may any person serve as an airman unless that person is otherwise qualified for the operation for which he is to be used.</li> </ol>	
	Sources: 121.135(b)(1); 121.383(a)(3)	
	Interfaces: 1.3.7(AW); 1.3.14(AW); 4.4.2(AW)	
1.7.	Does the certificate holder's manual contain the required references to, or excerpts from, operations specifications paragraph D.084(e)?	Yes No, Explain
	SRRs: 119.43(b); D.084(e)	☐ Not Applicable
1.8.	If the certificate holder's manual includes excerpts from its operations specifications, are the excerpts clearly identified as part of the operations specifications?	☐ Yes ☐ No, Explain ☐ Not Applicable
	SRRs: 119.43(b)(1); D.084(e)	
1.9.	Does the certificate holder's manual require compliance with operations specifications paragraph D.084(e)?  SRRs: 119.43(b)(2); D.084(e)	☐ Yes ☐ No, Explain ☐ Not Applicable
1.10.	Does the certificate holder's manual contain a method for keeping all persons engaged in its operations informed of the provisions of operations specifications paragraph D.084(e)?  SRRs: 119.43(c); D.084(e)	☐ Yes ☐ No, Explain ☐ Not Applicable
2.	Does the certificate holder's manual contain general policies for the Privileges and Limitations for Repairmen process that comply with the SRRs? SRRs: 121.135(b)(1); 121.383(a)(1)	Yes No, Explain
3.	Does the certificate holder's manual reference the appropriate Federal Aviation Regulations listed in the Supplemental Information section of this safety attribute inspection (SAI)?  SRRs: 121.135(b)(3)	☐ Yes ☐ No, Explain
4.	Does the certificate holder's manual contain the duties and responsibilities for personnel who will accomplish the Privileges and Limitations for Repairmen	Yes No, Explain

	process? SRRs: 121.135(b)(2)	
5.	Does the certificate holder's manual include instructions and information for personnel to meet the requirements of the Privileges and Limitations for Repairmen process?  SRRs: 121.135(a)(1)	☐ Yes ☐ No, Explain

## SAI SECTION 1 - PROCEDURES ATTRIBUTE Drop-Down Menu

- 1. No procedures, policy, instructions or information specified.
- 2. Procedures or instructions and information do not identify (who, what, when, where, how).
- 3. Procedures, policy or instructions and information do not comply with CFR.
- 4. Procedures, policy or instructions and information do not comply with FAA policy and guidance.
- 5. Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
- 6. Procedures, policy or instructions and information unclear or incomplete.
- 7. Documentation quality (e.g., unreadable or illegible).
- 8. Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM Flight Operations Manual to GMM General Maintenance Manual, etc.).
- 9. Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
- 10. Resource requirements incomplete (personnel, facilities, equipment, technical data).
- 11. Other.

### **SAI SECTION 2 - CONTROLS ATTRIBUTE**

Objective: Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the DCT are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the manual system to ensure that the most important manual policies, procedures, or instructions and information will be followed.

Controls may be in the form of administrative controls, which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to questions

rega	regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).		
Tasl	Tasks		
	To meet this objective, the inspector must accomplish the following tasks:		
1.	Review the control questions below.		
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the controls that it has documented		

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Are the following controls built into the Privileges and Limitations for Repairmen process:	
1.1.	Is there a control or controls in place to ensure that repairmen are employed and certificated for the maintenance, preventive maintenance, or alterations they perform?	☐ Yes ☐ No, Explain
1.2.	Is there a control or controls in place to ensure the aircraft airworthiness releases, that were issued by authorized repairmen, were restricted to work for which the repairmen were employed and certificated?	Yes No, Explain Not Applicable
1.3.	Is there a control or controls in place to ensure that RII inspections that are accomplished by authorized certificated repairmen are restricted to work for which the repairmen are employed and certificated?	Yes No, Explain Not Applicable
1.4.	Is there a control or controls in place to ensure repairmen entries in the aircraft log are restricted to work for which the repairmen are employed and certificated?	☐ Yes ☐ No, Explain
1.5.	Is there a control or controls in place to ensure that certificated repairmen understand the current instructions of the certificate holder and the manufacturer's instructions for continued airworthiness relating to the specific operations concerned?	☐ Yes ☐ No, Explain
1.6.	Is there a control or controls in place to ensure that maintenance, preventive maintenance, or alterations that are supervised by a certificated repairman are appropriate to the job for which he/she is employed and certificated?	Yes No, Explain Not Applicable
1.7.	Is there a control or controls in place to ensure that repairmen who supervise work functions understand the current instructions of the certificate holder and the manufacturer's instructions for continued airworthiness relating to the specific operations concerned?	☐ Yes ☐ No, Explain ☐ Not Applicable
1.8.	Is there a control or controls in place to ensure when the certificate holder operates an aircraft under a special flight permit, the evaluation and inspection	☐ Yes ☐ No, Explain

	is accomplished by an appropriately certificated repairman?	☐ Not Applicable
2.	Does the certificate holder have a documented method for assessing the impact of any changes made to the controls in the Privileges and Limitations for Repairmen process?	Yes No, Explain

	SAI SECTION 2 - CONTROLS ATTRIBUTE  Drop-Down Menu	
1.	No controls specified.	
2.	Documentation for the controls do not identify (who, what, when, where, how).	
3.	Controls incomplete.	
4.	Controls could be circumvented.	
5.	Controls could be unenforceable.	
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).	
7.	Other.	

### **SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE**

**Objective:** Process measurements are used by the certificate holder to measure and assess its processes, to identify and correct problems or potential problems, and to make improvements to the processes. The questions in this section of the DCT are designed to assist the inspector in determining if the certificate holder measures or assesses information to identify, analyze, and document potential problems with the process. Process measurements are a certificate holder's internal evaluation or auditing of the most important policies, procedures, or instructions and information associated with an element.

To prevent the duplication of work, process measurements are most commonly addressed through a combination of auditing features contained in both the certificate holder's safety program/internal evaluation program (for operations and cabin safety-related issues) and the auditing function of the Continuous Analysis and Surveillance System (for airworthiness or maintenance/inspection-related issues). The director of safety and the quality assurance department often work together to accomplish this function for the certificate holder. This approach requires amendment of the safety program/internal evaluation program audit forms or checklists and the Continuous Analysis and Surveillance System audit forms or checklists to include the specific process measurements for each element.

Tasi	Tasks	
	To meet this objective, the inspector must accomplish the following tasks:	
1.	Review the process measurement questions below.	
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the process measurements that it has documented.	

Que	Questions		
	To meet this objective, the inspector must answer the following questions:		
1.	Does the certificate holder's Privileges and Limitations for Repairmen process include the following process measurements:		
1.1.	Is there a process measurement or process measurements that would identify if maintenance, preventive maintenance, or alterations were performed by other than repairmen employed and certificated for the work?	Yes No, Explain	
1.2.	Is there a process measurement or process measurements that would identify if aircraft airworthiness releases were issued by other than authorized repairmen?	Yes No, Explain Not Applicable	
1.3.	Is there a process measurement or process measurements that would identify if any RII inspections were accomplished by other than authorized repairmen?	☐ Yes ☐ No, Explain ☐ Not Applicable	
1.4.	Is there a process measurement or process measurements that would identify if repairman's entries in the aircraft log were for work other than that for which the repairman was employed and certificated?	☐ Yes ☐ No, Explain	
1.5.	Is there a process measurement or process measurements that would identify if a repairman lacks understanding of either the current instructions of the certificate holder or the manufacturer's instructions?	Yes No, Explain	
1.6.	Is there a process measurement or process measurements that would identify if maintenance, preventive maintenance, or alterations that were supervised by a certificated repairman were not appropriate to the job for which he/she was employed and certificated?	Yes No, Explain Not Applicable	

1.7.	Is there a process measurement or process measurements that would identify if repairmen who supervised work functions failed to understand the current instructions of the certificate holder and the manufacturer's instructions for continued airworthiness relating to the specific operations concerned?	☐ Yes ☐ No, Explain ☐ Not Applicable
1.8.	Is there a process measurement or process measurements that would identify if the certificate holder operated an aircraft under a special flight permit, without accomplishing the evaluation and inspection with an appropriately certificated repairman?	Yes No, Explain Not Applicable
2.	Is there a process measurement or process measurements that would reveal if the certificate holder's policy, procedures, instructions, and information in its manual were not followed?	Yes No, Explain
3.	Does the certificate holder document its process measurement results?	☐ Yes ☐ No, Explain
4.	Does the certificate holder provide for the use of process measurement results to improve its programs?	☐ Yes ☐ No, Explain
5.	Does the organization that conducts the process measurements have direct access to the person with responsibility for the Privileges and Limitations for Repairmen process?	Yes No, Explain

## SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE Drop-Down Menu

- 1. No process measurements specified.
- 2. Documentation for the process measurements does not identify (who, what, when, where, how).
- 3. Inability to identify negative findings.
- 4. No provisions for implementing corrective actions.
- 5. Ineffective follow-up to determine effectiveness of corrective actions.
- 6. Resources requirements (personnel, facilities, equipment, technical data).
- 7. Other.

### **SAI SECTION 4 - INTERFACES ATTRIBUTE**

**Objective:** Interfaces are used by the certificate holder to identify and manage the interactions between processes. The questions in this section of the DCT are designed to assist the inspector in determining whether or not interactions between the policies, procedures, or instructions and information associated with other independent processes within the certificate holder's organization are documented. Written policies, procedures, or instructions and information that are interrelated and located in different manuals within the certificate holder's manual system must be consistent and complement each other. For the interfaces to be effectively managed, it is not only important to identify what the interfaces are, but it is imperative to document the specific location of the interfaces within the certificate holder's manual system.

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Tasks			
	To meet this objective, the inspector must accomplish the following tasks:		
1.	Review the interfaces associated with the Privileges and Limitations for Repairmen process that have been identified along with the individual questions in section 1, Procedures, of this DCT.		
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the interfaces that it has documented.		

Questions		
	To meet this objective, the inspector must answer the following questions:  Note: The design task items (JTIs) displayed with the questions in section 1,  Procedures, of this DCT identify potential interfaces (by element number) for this element.	
1.	Does the certificate holder's manual properly address the interfaces that are identified along with the individual questions in the section 1, Procedures, of this DCT?	☐ Yes ☐ No, Explain
2.	Does the certificate holder document a method for assessing the impact of any changes to the associated interfaces within the Privileges and Limitations for Repairmen process?	☐ Yes ☐ No, Explain

# SAI SECTION 4 - INTERFACES ATTRIBUTE Drop-Down Menu

- 1. No interfaces specified.
- 2. The following interfaces not identified within the Certificate Holder's manual system:
- 3. Interfaces listed are inaccurate.
- 4. Specific location of interfaces not identified within the manual system.
- 5. Other

### SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTES

**Objective:** The questions in this section of the DCT address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

may or may not be the person with the responsibility.)				
Tasks				
	To meet this objective, the inspector must accomplish the following tasks:			
1.	Identify the person who has overall responsibility for the Privileges and Limitations for Repairmen process.			
2.	Identify the person who has overall authority for the Privileges and Limitations for Repairmen process.			
3.	Review the duties and responsibilities of the person(s) documented in the certificate holder's manual.			
4.	Review the appropriate organizational chart.			

Questions				
	To meet this objective, the inspector must answer the following questions:			
1.	Does the certificate holder's manual clearly identify who is responsible for the quality of the Privileges and Limitations for Repairmen process?	Yes No, Explain Name/Title:		
2.	Does the certificate holder's manual clearly identify who has authority to establish and modify the policies, procedures, instructions, and information for the Privileges and Limitations for Repairmen process?	Yes No, Explain Name/Title:		
3.	Does the certificate holder's manual include the duties and responsibilities of those who manage the work required by the Privileges and Limitations for Repairmen process?  SRRs: 121.135(b)(2)	☐ Yes ☐ No, Explain		
4.	Does the certificate holder's manual include instructions and information for those who manage the work required by the Privileges and Limitations for Repairmen process?  SRRs: 121.135(a)(1)	☐ Yes ☐ No, Explain		
5.	Does the certificate holder's manual clearly and completely document the responsibility for this position?	☐ Yes ☐ No, Explain		
6.	Does the certificate holder's manual clearly and completely document the authority for this position?	☐ Yes ☐ No, Explain		
7.	Does the certificate holder's manual clearly and completely document its qualification standards for the person having responsibility for the Privileges and Limitations for Repairmen process?	Yes No, Explain		
8.	Does the certificate holder's manual clearly and completely document its qualification standards for the person having authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Privileges and Limitations for Repairmen process?	☐ Yes ☐ No, Explain		

9.	Does the certificate holder's manual clearly and completely document the procedures for delegation of authority for the Privileges and Limitations for Repairmen process?	Yes No, Explain
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# SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTES Drop-Down Menu

- 1. Not documented.
- 2. Documentation unclear.
- 3. Documentation incomplete.
- 4. Other.